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January 7, 2014

BY ELECTRONIC MAIL AND HAND DELIVERY

The Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1620
New York, New York 10007-1312

Re: Master File C.A. No. 1:00-1898 (SAS), M21-88, MDL No. 1358
Joint Proposed Revisions to CMO 111
Joint Request to Adjourn or Limit Attendance at January 14 Status Conference

Dear Judge Scheindlin:

I write on behalf of Defendants and Plaintiffs for two purposes.

First, to jointly request modification of two interim dates in CMO 111, which applies only to the new matters filed in 2013.¹ The proposed modifications would (1) extend the deadline to comply with CMO 4 and 10 disclosures from March 15, 2014 to May 15, 2014; and (2) extend the deadline to join third parties from May 15, 2014 to June 30, 2014. All other dates in CMO 111 would remain unchanged. Plaintiffs and Defendants seek these modifications so that they may have time to discuss possible resolution of these new matters. A copy of the revised CMO is attached for the Court's consideration.

Second, to jointly propose that the January 14 status conference be adjourned or that required attendance be limited. Only one agenda item has been identified for the conference, and that involves the Puerto Rico plaintiffs and a single, dismissed defendant (Peerless). That agenda item is likely to be resolved before the conference. If it is not resolved, both sides would propose that attendance be required only of Puerto Rico plaintiffs' counsel and counsel for Peerless. Also, if the Court would like to discuss the proposed revisions to CMO 111, both sides would

¹ *Town of Brewster, et al. v. Atlantic Richfield Co., et al.*, No. 13-cv-07247; *Town of Hinesburg v. Atlantic Richfield Co., et al.*, No. 13-cv-07271; *City of Manning v. Ashland Inc., et al.*, No. 13-cv-07272; and *City of Portageville v. Ashland, Inc., et al.*, No. 13-cv-07299.

The Honorable Shira A. Scheindlin

January 7, 2014

Page 2

propose that attendance at the conference for that issue be required only of both side's respective
Liaison Counsel.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

James A. Pardo

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All counsel of Record